

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

REBECCA FRANCESCATI,)	
)	
)	
)	
Plaintiff,)	No. 1:11-cv-05270
)	
v.)	
)	Honorable Marvin E. Aspen
STEFANI JOANNE GERMANOTTA)	Magistrate Judge Jeffrey T. Gilbert
p/k/a LADY GAGA, INTERSCOPE RECORDS,)	
UNIVERSAL MUSIC GROUP, INC.,)	ECF CASE
DJ WHITE SHADOW, LLC, and)	
BRIAN JOSEPH GAYNOR,)	JURY TRIAL DEMANDED
)	
Defendant.)	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Stefani Joanne Germanotta, UMG Recordings, Inc. (incorrectly sued herein as Interscope Records and Universal Music Group, Inc.), DJ White Shadow LLC, and Brian Gaynor (together, the “Defendants”) hereby respectfully move (the “Motion”) this Court to enter summary judgment dismissing the complaint, pursuant to Federal Rule of Civil Procedure 56, and to award the Defendants their costs and attorneys fees as provided for by 17 U.S.C. § 505. In support of their Motion, Defendants submit a Memorandum of Law in Support and a Statement of Undisputed Facts pursuant to Local Rule 56.1 contemporaneously herewith.

Dated: March 4, 2013

Respectfully Submitted,

/s/Catherine J. Spector

Charles Ortner
Sandra A. Crawshaw-Sparks
Alexander Kaplan
Kevin S. Blum
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
cortner@proskauer.com
scrawshaw@proskauer.com
akaplan@proskauer.com
kblum@proskauer.com

Steven R. Gilford
Catherine J. Spector
PROSKAUER ROSE LLP
70 West Madison St., Suite 3800
Chicago, IL 60602
Tel: (312) 962-3550
sgilford@proskauer.com
cspector@proskauer.com
Attorneys for Stefani Joanne Germanotta

/s/Elvis D. Gonzalez

Elvis D. Gonzalez
ELVIS GONZALEZ, LTD.
Three First National Plaza
70 West Madison St., Suite 1515
Chicago, IL 60602
Tel: (312) 558-9779
egonzalez@elvisgonzalezltd.com
Attorney for DJ White Shadow, LLC

/s/Andrew H. Bart

Christopher B. Lay
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654
Tel: (312) 840-7295
clay@jenner.com

Andrew H. Bart
JENNER & BLOCK LLP
919 Third Avenue – 37th Floor
New York, NY 10022-3908
Tel: (212) 891-1600
abart@jenner.com
Attorneys for UMG Recordings, Inc.

/s/Bryan E. Curry

John J. Bullaro, Jr.
Bryan E. Curry
BULLARO & CARTON PC
200 North LaSalle St., Suite 2420
Chicago, IL 60601
Tel: (312) 831-1000
jbullaro@bullarocarton.com
bcurry@bullarocarton.com
Attorneys for Brian Joseph Gaynor

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system on this 4th day of March, 2013.

/s/ Catherine J. Spector

Catherine J. Spector